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U.S. Department
of Transportation

United States
Coast Guard



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U.S. Coast Guard

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JUN 24 1993

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Ms. Donna R. Searcy, Secretary
Federal Communications Commission
1919 M Street, N.W.
Washington, D.C. 20554

JUL 01 1993
FCC MAIL ROOM

Dear Ms. Searcy:

Enclosed are comments in reply to PR Docket 92-257, Amendment to the Commission's Rules Concerning Maritime Communications.

Sincerely,

A handwritten signature in cursive script, reading "Joseph D. Hersey, Jr.".
JOSEPH D. HERSEY, JR.
Telecommunications Management Division
By direction of the Commandant

Enclosure: PR Docket 92-257 Reply Comments

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REPLY COMMENTS

22 June 1993 JUL - 1 1993

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Notice of Inquiry

1. HF narrow-band direct printing (FCC para 19). HAL, Pin Oaks and others note the inefficiency, slow data rate and poor error correction capability of CCIR Rec 625 narrow-band direct printing (sitor), and recommended a more efficient method of modulation, such as "CLOVER", be allowed instead. We agree. However since HF narrow-band direct printing operates internationally and since the number of available HF maritime mobile channels is severely limited, any new method of modulation using these HF maritime mobile bands should be accepted by CCIR. It should also be capable of accepting calls from CCIR Rec 625-based equipment. We request FCC (and HAL) assistance in preparing a draft CCIR Recommendation adopting an improved HF NBDP standard such as CLOVER as a matter of urgency, in addition to allowing its use under Part 80. We will support that effort. We note however that propriety and licensing questions regarding CLOVER will need to be addressed before a recommendation can be submitted to CCIR.

2. Digital selective calling (DSC)(FCC para 15). We note that all those commenting on DSC supported our petition for a minimum DSC requirement on all maritime radios by 1997. We urge the FCC to prepare a notice of proposed rulemaking on this issue as a matter of urgency, to allow manufacturers sufficient time to meet this 1997 date. We concur with SEA's comments concerning MF/HF DSC. We will ask RTCM to include its SC101 recommendation in a document which can be referenced or included by the Commission in its NPRM.

3. Coast Guard watchkeeping on VHF channel 16 (FCC para 18 c). We have no plans for discontinuing or reducing watchkeeping on VHF channel 16 on shore in the near future, and would only consider doing so if we could be assured that maritime safety would not be jeopardized. We do envision DSC eventually allowing us to discontinue channel 16 watchkeeping on ships as well as on shore.

4. VHF narrowbanding (FCC para 28). We concur with the Radio Technical Commission for Maritime Services (RTCM), National Marine Electronics Association (NMEA), Global Marine and Ross, Ohio River Company (ORCO) and others supporting narrowbanding of the VHF maritime band. To accomplish this, we request the FCC propose that International Telecommunications Union Recommendation 318 be included in the agenda for the 1995 ITU World Radio Conference (WRC-95).

5. EPIRB licensing (RTCM page A-12). We support the RTCM's proposal to automatically include all types of EPIRBs authorized by the Commission under the ship station license, and recommend it be adopted as an administrative change.

Notice of Proposed Rulemaking

6. Private land mobile use of marine frequencies (FCC para 37 and proposed new Section 90.283). We recognize the increasing scarcity of spectrum in the VHF band, and support the principle of spectrum sharing among services, including the maritime service. We note the FCC proposal limited sharing to maritime public correspondence channels. However, ORCO, NMEA, Mobile Marine Radio (MMR) and others point out some difficulties which we believe must first be resolved.

MMR submitted an engineering report addressing separation distances necessary to prevent land mobile users from causing harmful interference to the marine services. That report noted difficulties with the way Industrial/Land Transportation frequency pairings are assigned to base/mobile stations, and the proposed co-channel separation distances. We have reviewed that report, and concur with its findings. We recommend that the frequency pairs proposed in 90.283 not be implemented until these issues are resolved.

Although the Association of American Railroads documentation of numbers and locations of radio systems do not indicate the bands in which these radios operate, they did note that "locations where PLMR frequency congestion is most severe and where, therefore, the opportunity for maritime sharing simply does not exist." (AAR para 10). MMR says much the same thing: "Analysis of the 1983 Planning Staff Report further reveals that the action proposed herein will provide no benefit to 17 of the 21 metropolitan areas projected to suffer spectrum shortfalls. Only